

June 18, 2007

Ms. Rebecca Duff  
ICF International  
1725 I Street NW  
Suite 1000  
Washington, DC 20006

Dear Ms. Duff:

Johnson Controls Inc. appreciates the opportunity to provide comments as shown below on the Proposed ENERGY STAR Tier II Criteria V2.1 for Residential Furnaces, as requested in the letter dated June 8, 2007 from the United States Environmental Protection Agency, authored by Ms. Rachel Schmeltz.

**Eligibility Criteria**

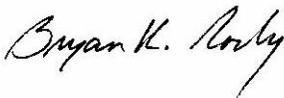
With regard to the eligibility specifications for gas furnaces, we support the energy efficiency criteria as shown in section (3) of the Eligibility Criteria Version 2.1 – Draft 1 document of 92% AFUE. The effective date of October 1, 2008 of this change is also acceptable as shown in section (5). This proposed change does provide for an increased energy efficiency level over the current criteria and over standard products that are available in the marketplace, yet we feel it does not place any significant burden on manufacturers to achieve this energy savings.

**Furnace Fan Efficiency Requirements**

We also support the decision to delay the inclusion of furnace fan requirements at this time for the same reasons previously stated by the EPA, GAMA, and others. We agree that there are still significant issues on the matter of furnace fan test procedures, accuracy and repeatability of said testing, as well as regional differences and impacts for furnace applications regarding the need for such requirements. Johnson Controls Inc. does believe that further discussions and research are still required on this topic before any criteria on furnace fan efficiency is added to the ENERGY STAR criteria.

Thank you again for the opportunity to submit these comments. If you have any questions regarding this submission, please feel free to contact me as necessary.

Sincerely,



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North America

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